



BellSouth Telecommunications, Inc.
Suite 2101
333 Commerce Street
Nashville, Tennessee 37201-3300

615 214-6301
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April 14, 2000

Guy M. Hicks
General Counsel

EXECUTIVE SECRETARY

VIA HAND DELIVERY

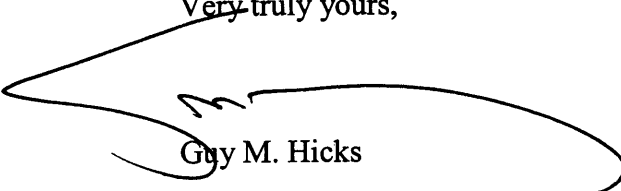
David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

Re: *Petition of MCI WorldCom to Enforce Interconnection Agreement with BellSouth*
Docket No. 99-00662

Dear Mr. Waddell:

Enclosed are the original and thirteen copies of BellSouth Telecommunications, Inc.'s First Request for Production of Documents to MCI WorldCom, Inc. Copies of the enclosed are being provided to counsel of record for all parties.

Very truly yours,


Guy M. Hicks

GMH:ch
Enclosure

BEFORE THE TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee

In Re:)
)
Petition of MCIWorldCom to Enforce) Docket No. 99-00662
Interconnection Agreement with)
BellSouth)

BELLSOUTH TELECOMMUNICATIONS, INC.'S
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO
MCI WORLDCOM, INC.

BellSouth Telecommunications, Inc. ("BellSouth") hereby requests MCI WorldCom, Inc. ("MCI WorldCom") to furnish documents in response to the following Requests for Production by May 4, 2000.

INSTRUCTIONS

(a) If any response required by way of answer to these Requests for Production is considered to contain confidential or protected information, please furnish this information subject to a protective agreement.

(b) If any document is withheld under a claim of privilege, please furnish a list of each document for which the privilege is claimed, reflecting the name and address of the person who prepared the document, the date the document was prepared, each person who was sent a copy of the document, each person who has viewed or who has had custody of a copy of the document, and a statement of the basis on which the privilege was claimed.

(c) These Requests for Production are to be answered with reference to all information in your possession, custody or control or reasonably available to

you. These Requests for Production are intended to include requests for information that is physically within MCI WorldCom's possession, custody or control as well as in the possession, custody or control of MCI WorldCom's agents, attorneys, or other third parties from which such documents may be obtained.

(d) If any Request for Production cannot be responded in full, answer to the extent possible and specify the reason for your inability to respond fully. If you object to any part of a Request for Production, answer all parts of the request to which you do not object, and as to each part to which you do object, separately set forth this specific basis for the objection.

(e) These Requests for Production are continuing in nature and require supplemental responses should information unknown to you at the time you serve your responses to these requests subsequently become known or should your initial response be incorrect or untrue.

DEFINITIONS

(a) "MCI WorldCom" means MCI WorldCom, Inc., any predecessors in interest, its parent, subsidiaries, and affiliates, including, but not limited to, MCImetro Access Transmission Services, Inc., their present and former officers, employees, agents, directors, and all other persons acting or purporting to act on behalf of MCI WorldCom, Inc.

(b) "You" and "your" refer to MCI WorldCom.

(c) "Complaint" refers to the Complaint filed with the Tennessee Regulatory Authority on September 9, 1999 in Docket No. 99-00662 by MCI WorldCom, Inc. against BellSouth Telecommunications, Inc.

(d) "Interconnection Agreement" means the interconnection agreement executed by MCImetro Access Transmission Services, Inc. and BellSouth on April 4, 1997, which is the subject of the Complaint.

(e) "Person" means any natural person, corporation, corporate division, partnership, other unincorporated association, trust, government agency, or entity.

REQUESTS FOR PRODUCTION

1. Produce copies of all documents identified in response to BellSouth's First Set of Interrogatories.

2. Produce all documents that refer or relate to or were generated in connection with MCI WorldCom's negotiation or execution of Interconnection Agreement.

3. Produce all documents that refer or relate to or support MCI WorldCom's contention that it understood calls to Internet Service Providers ("ISPs") to be "local traffic" under the Interconnection Agreement.

4. Produce all documents that refer or relate to or support MCI WorldCom's contention that it understood that calls to ISPs "terminate" at the ISP under the Interconnection Agreement.

5. Produce all documents that support or refer or relate to MCI WorldCom's allegations in the Complaint, including, but not limited to, all

documents created prior to September 1, 1997 reflecting MCI WorldCom's belief that it would be receiving reciprocal compensation from BellSouth for ISP traffic.

6. Produce all documents that refer or relate to any projections, estimates, studies, calculations, or budgets developed by or on behalf of MCI WorldCom that reflect the amount of reciprocal compensation MCI WorldCom expected to receive from BellSouth.


7. Produce all documents that refer or relate to any projections, estimates, studies, calculations, or budgets developed by or on behalf of MCI WorldCom that reflect the volume of calls MCI WorldCom expected to receive from BellSouth customers to Internet Service Providers served by MCI WorldCom.

8. Produce all documents that refer or relate to any arrangement or agreement between MCI WorldCom and any other person that involves the sharing of any reciprocal compensation received by MCI WorldCom from BellSouth.

9. Produce all documents that refer or relate to any reciprocal compensation that MCI WorldCom has billed BellSouth for traffic generated by or directed to any person or entity with which MCI WorldCom has an arrangement or agreement to share reciprocal compensation received by MCI WorldCom from BellSouth.

Respectfully submitted this 7th day of April, 2000.

BELLSOUTH TELECOMMUNICATIONS, INC.

A handwritten signature in black ink, appearing to read "Guy M. Hicks", is written over a horizontal line.

Guy M. Hicks
333 Commerce Street, Suite 2101
Nashville, Tennessee 37201-3300
(615) 214-6301

R. Douglas Lackey
Bennett L. Ross
675 W. Peachtree Street, Suite 4300
Atlanta, Georgia 30375

203845

CERTIFICATE OF SERVICE

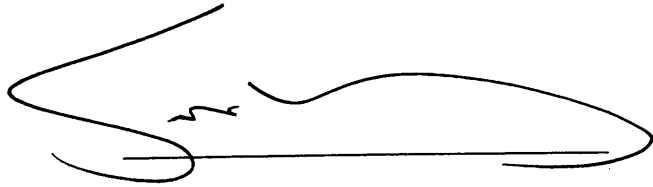
I hereby certify that on April 14, 2000, a copy of the foregoing document was served on the parties of record, via the method indicated:

- ☒ Hand
- ☐ Mail
- ☐ Facsimile
- ☐ Overnight

Richard Collier, Esquire
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0500

- ☐ Hand
- ☒ Mail
- ☐ Facsimile
- ☐ Overnight

Henry Walker, Esquire
Boult, Cummings, et al.
414 Union Ave., #1600
P. O. Box 198062
Nashville, TN 39219-8062

A handwritten signature in black ink, appearing to be "H. Walker", written over a horizontal line.